

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK**

CHARLES DEMPSEY, individually, and  
L.D. by her father and natural guardian,  
CHARLES DEMPSEY,

Plaintiffs,

-against-

THE CITY OF ROCHESTER, a municipal  
entity, JAVIER ALGARIN, "JOHN DOE"  
RPD OFFICER RESPONSIBLE FOR  
TRAINING JAVIER ALGARIN,

Defendants.

**DECLARATION OF JAMES  
CROSBY**

**19-cv-6780 (EAW)(MWP)**

I, James Crosby, declare as follows:

1. I am an expert in canine behavior, dog aggression, and the use of force in canine encounters. I have been retained as an expert witness in the above-captioned case.
2. I hereby declare that if I am called to testify at trial in this case, I will testify consistent with the opinions provided in my expert report dated January 31, 2024

I declare under penalty of perjury under the laws of United States of America that the foregoing is true and correct.

Dated: August 9, 2024



James W. Crosby, M.S., PhD